

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

BID FOR POSITION, LLC,

Plaintiff,

v.

AOL, LLC and GOOGLE, INC.,

Defendants.

CASE NO. 2:07-cv-582 JBF/TEM

MOTION TO SEAL

Plaintiff Bid For Position, LLC, by counsel and pursuant to Local Civil Rule 5 (E.D. Va. 2008) and the Agreed Protective Order entered in this action, hereby requests that this Court maintain under seal the original, unredacted versions of Plaintiff's Brief in Opposition to Defendants' Motion for Summary Judgment of Non-Infringement; the August 6, 2008 Declaration of Don Turnbull (the "Turnbull Declaration") in support thereof; the August 6, 2008 Declaration of Gregory Dovel (the "Dovel Declaration") in support thereof and Exhibits 3-9, 21-23 and 25 to the Dovel Declaration. This Motion to Seal is based on the non-confidential memorandum filed herewith.

Dated: August 6, 2008

Respectfully submitted,

BID FOR POSITION, LLC

By Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on August 6, 2008, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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